

Re: Carrasquillo v. Westech Security and Investigation Inc. (1:23-cv-04931-MKV)

Abbie Sebastianelli <asebastianelli@cervinilawgroup.com>

Thu 12/14/2023 11:25 AM

To: Robert Kansao <robert@leelitigation.com>

Cc: CK Lee <cklee@leelitigation.com>; Gerlis Tejada <gerlis@leelitigation.com>; Joseph Cervini <jcervini@cervinilawgroup.com>

 1 attachments (184 KB)

Initial Disclosures.pdf;

Robert,

Attached please find the Initial Disclosures, now amended to include the individual's job titles.

With respect to your second point, our client has advised us that these time records are the actual clock-in-and-out records.

Finally, I have not received a response to my emails relating to Plaintiff's individual damages for purposes of your Initial Disclosures.

Best Regards,

On Wed, Dec 13, 2023 at 5:59 PM Robert Kansao <robert@leelitigation.com> wrote:

Good Afternoon Abbie,

Thank you for providing the initial disclosures, but I want to highlight the below two issues:

First, please provide the job titles of the people you identify in your initial disclosures. Otherwise, it is impossible to even guess what relevant information they possess.

Second, you attached 'time-records' of Plaintiff to your motion to dismiss. I also see a reference to time-records in your initial disclosures. As I raise in my motion, the time-records you attached to the motion are not actual clock-in records. As part of your production, please provide us with records containing Plaintiff's actual "punch-times" or, in this case, call-in-and-out times. In the alternative, please let us know if no such records exist.

Thank you,

Robert A Kansao

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